## Law Offices of ELMER ROBERT KEACH, III

A Professional Corporation

One Pine West Plaza, Suite 109 Albany, NY 12205

Telephone: 518.434.1718 Facsimile: 518.770.1558

Electronic Mail: bobkeach@keachlawfirm.com

March 11, 2014

The Honorable Frederick J. Scullin Senior United States District Judge United States District Court for the Northern District of New York Federal Building and U.S. Courthouse 100 South Clinton Street Syracuse, NY 13202

Re: *Haag-Morris v. Correctional Medical Care*, No. 13-CV-1321 (FJS/TWD)

Dear Judge Scullin:

By this letter, the Plaintiff seeks a two day extension of time to respond to the Defendants' pending Motion to Dismiss, until March 13, 2014. Pursuant to the recent scheduling order of the Court, the Plaintiff's response is due today, March 11, 2014. The basis for the Plaintiff's request is the commitment of her counsel to an emergent criminal matter that has consumed much of his time during the past week. I have contacted counsel for all Defendants, and they have graciously consented to this request provided they are provided with an additional two days to file their reply papers, until March 19, 2014. I do not believe that this request for extension will require an adjournment of the Court's return date, given that this matter will be decided on submission.

Thank you for your consideration of this letter. Should Your Honor require anything further, please do not hesitate to contact me.

Respectfully Yours,

/s Elmer Robert Keach, III

Elmer Robert Keach, III

cc:
By ECF
All Counsel of Record